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May 28, 2025


**VIA ECF**

The Honorable Jennifer L. Rochon  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1920  
New York, NY 10007

Request GRANTED. The initial pretrial conference and the associated filing deadlines are hereby ADJOURNED pending the Court's resolution of the anticipated motion to dismiss.

**SO ORDERED.**

Dated: May 29, 2025  
New York, New York

  
**JENNIFER L. ROCHON**  
United States District Judge

**Re: Stern v. JPMorgan Chase & Co., et al., No. 25-cv-02097 (JLR)**

Dear Judge Rochon:

The parties in the above-referenced action jointly move to adjourn the initial pretrial conference, currently scheduled for June 12, 2025, and vacate the corresponding deadline to submit a joint letter and proposed Civil Case Management Plan and Scheduling Order in light of Defendants' forthcoming motion to dismiss. In support, the parties respectively state as follows:

1. On March 7, 2025, Plaintiffs filed the Complaint (ECF No. 1). The complaint brings claims under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), regarding the cost of prescription-drug benefits available under the JPMorgan Chase Healthcare and Insurance Program for Active Employees and its component Medical Plan and the monitoring of the Plan's pharmacy benefit manager.
2. On March 15, 2025, the Court entered a Notice of Initial Pretrial Conference, setting an initial pretrial conference for June 12, 2025 and also ordering the parties to file a joint letter and proposed Civil Case Management Plan and Scheduling Order no later than ten calendar days before the Initial Pretrial Conference. ECF No. 4.
3. Defendants intend to file a motion to dismiss the Complaint (the "Motion"). On April 4, 2025, the Court granted the parties' request to set deadlines for briefing relating to the Motion. ECF No. 20. The Motion is scheduled to be filed on or before June 3, 2025. *Id.*
4. The parties respectively request that, in light of Defendants' forthcoming Motion and in the interests of efficiency and judicial economy, the court adjourn the initial pretrial conference and vacate the deadline to file the joint letter and proposed Civil Case Management Plan and Scheduling Order, to be reset, if necessary, after the Court resolves the Motion.
5. This is the parties' first request for an adjournment of the initial pretrial conference or an extension of the deadline to file the joint letter and proposed Civil Case

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Management Plan and Scheduling Order. This request will not affect the deadlines for briefing relating to the Motion.

Respectfully submitted,

/s/ Michael Eisenkraft (with permission)

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